

**United States of America
District Court
Eastern District of Wisconsin**

United States of America,

Plaintiff,

v.

Case No. 21-CR-57

Jovante Champion,

Defendant.

Defendant's Second Revise Notice of Alibi Defense

Now comes the above-named defendant, by his attorney, and pursuant to Rule 12.1(a)(2) FRCrP, responds to the government's request for notice of alibi defense as follows:

1. The defendant, Jovante Champion, hereby puts the government on notice that he may present evidence during trial that, during the charging period of the indictment, and on the specific dates set forth in the government's request for notice of alibi defense, he was never in the State of Tennessee or the State of Texas. Champion went to Chicago, Illinois, on several occasions, but he was not at the locations alleged in the discovery materials. He was at the Moorish Temple in Chicago. Except as set forth below, Champion may not be able to specify his exact location during each of the dates that the government's notice claims he was in Tennessee, Texas, or Illinois. However, Champion was most likely in the Milwaukee, Wisconsin area. Champion is able to present evidence of his exact location as follows:
 - a. On June 13, 2019, for the entire day, he was in Minneapolis, MN
 - b. From May 6, 2019 to August 2, 2019 he was employed in Milwaukee by UMOS. During that period he worked, on average, forty hours per week.

- c. Champion will present evidence that on several occasions he went to Chicago, IL to provide security at the Moorish Temple.
2. In addition to the possibility that Champion may testify, Champion reserves the right to call the following persons as witnesses at trial concerning his partial alibi defense:
 - a. **Cindy Papka**, Private Investigator, P.O. Box 20817, Milwaukee, WI 414-559-5953
 - b. **Hector Lemar**, UMOS, 2701 S. Chase Ave., Milwaukee, WI 414-389-6000
 - c. **Travonte Champion**, 4467 N. 53rd St., Milwaukee, WI (telephone number unknown)
 - d. **Trey Champion**, 4467 N. 53rd St., Milwaukee, WI (telephone number unknown)
 - e. **Naomi Weightman**, (address unknown) 414-241-3153
 - f. **Rhoda Barnes**, 4467 N. 53rd St., Milwaukee, WI
 - g. **Kieza Hogan Bey**, 2340 N. 36th St., Milwaukee, WI 414-2486972
3. Champion is aware of the statutory obligation to supplement this notice if more information becomes available. It is anticipated that more information will, in fact, become available. Cindy Papka is attempting to obtain UMOS employment records, and will be submitting reports concerning her interviews of the witnesses.

Dated at Milwaukee, Wisconsin, this 21st day of June, 2022.

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Attorneys for the Defendant

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